

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

In re: Angela Velasquez : 15-11644-ELF
Debtor :
: CHAPTER 13

AMENDED MOTION TO MODIFY PLAN AFTER CONFIRMATION

The Debtor, by her attorney, hereby moves to modify her chapter 13 plan. In support of this motion, she avers:

1. The chapter 13 plan presently calls for her to pay \$361.00 per month to the trustee.
2. Because of unanticipated financial problems, including mismanagement of family funds by debtor's husband, the Debtor has fallen behind on her mortgage payments.
3. Debtor's mortgage lender has consented to a stipulation permitting debtor to repay her delinquent mortgage payments through her chapter 13 plan.
4. A proposed modified plan is attached hereto and labeled Exhibit A.
5. Under the modified plan the Debtor would increase her trustee payments to \$827.80 monthly. The plan as modified meets the requirements of the Bankruptcy Code.

WHEREFORE, the Debtor prays that she be permitted to amend her plan to confirm the attached 2nd amended chapter 13 plan pursuant to 11 U.S.C. Section 1329.

Respectfully submitted,

Stephen M. Dunne, Esquire
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